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To Victor Janosik/R3/USEPA/US@EPA

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Subject Lord Shope Landfill July Progress Report

ORIGINAL



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Vic,

I reviewed the July, 2005 monthly progress report for the Lord-Shope thermal oxidizer. The current report contained a wealth of information that was not provided in previous reports. I offer the following comments:

For this reporting period, five samples from the thermal oxidizer were collected and submitted for analysis using EPA Method TO-15 to an independent laboratory. Phosgene was not detected in the oxidizer's exhaust. I now feel confident that the phosgene detected in the past in the oxidizer's exhaust was an artifact of the previous sampling and analysis methods employed by Lord Corporation.

The July, 2005 monthly progress report included a write-up of the oxidizer's operation. The oxidizer's efficiency during this reporting period was 99.4% (without the inclusion of TICs) which is a vast improvement over the last reporting period's efficiency of 97.6%. While Lord did not calculate the efficiency of the oxidizer with TICs, there was enough information to determine that the efficiency with the inclusion of TICs was 99.3%. Notice that the inclusion of TICs now makes very little difference in the efficiency calculations. This is because the new analysis method and the use of an independent laboratory have decreased the amount of compounds that cannot be adequately identified. If Lord continues to use an independent laboratory and EPA Method TO-15 to analyze the oxidizer samples, they no longer have to include TICs in their efficiency calculations provided that Lord continue to submit the TICs with the laboratory reports.

The monthly progress report contained a case narrative, the ISVS system monitoring parameters and the methane results that were requested of Lord Corporation. The data show that the flow of landfill gas has increased 9 SCFM from the last reporting period. The total VOCs routed to the oxidizer has also increased dramatically. In February 2005, the total VOCs were 103 ppm. During the June reporting period, the total VOCs were 198 ppm. The total VOCs in July have increased to 250 ppm. In June, Lord Corporation petitioned EPA to terminate off-gas treatment operations at the landfill. The current upward trend in gas emissions and VOC concentrations, and the large fluctuations in landfill gas being produced demonstrate that it is premature to consider terminating off-gas treatment.

If you have any questions or concerns, please contact me at x2193.

- Pat

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SCFM = Standard
cubic feet per minute